

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

REVERSE MORTGAGE
SOLUTIONS, INC.

PLAINTIFF

Vs.

THE ESTATE OF IRMA
CONCEPCION FLORES FERREIRO
A/K/A IRMA C. FLORES FERREIRO
A/K/A IRMA FLORES DE TALLADA
A/K/A IRMA FLORES TALLADA
A/K/A IRMA FLORES FERREIRO
COMPOSED BY MANUEL ANTONIO
ARROYO FLORES AND EDDIE
ARROYO FLORES; RICHARD DOE;
MUNICIPAL REVENUE
COLLECTION CENTER ("CRIM");
PUERTO RICO TREASURY
DEPARTMENT; UNITED STATES OF
AMERICA; MARY DOE

DEFENDANTS

CIVIL ACTION NO. 3:15-cv-01854-CCC

FORECLOSURE OF MORTGAGE

MOTION REQUESTING ENTRY OF DEFAULT PURSUANT TO FED.R.CIV.P.55(a)

TO THE HONORABLE COURT:

NOW COMES, Plaintiff, REVERSE MORTGAGE SOLUTIONS, INC., through its undersigned attorney, for its cause of action and respectfully alleges as follows:

1. REVERSE MORTGAGE SOLUTIONS, INC., filed an Amended Complaint on **September 8, 2015**, by filing a Complaint against THE ESTATE OF IRMA CONCEPCION FLORES FERREIRO A/K/A IRMA C. FLORES FERREIRO A/K/A IRMA FLORES DE TALLADA A/K/A IRMA FLORES TALLADA A/K/A IRMA FLORES FERREIRO COMPOSED BY MANUEL ANTONIO ARROYO FLORES

[MP# 15-000715/15-000715-1/JR/Nov 24, 2015]

AND EDDIE ARROYO FLORES; RICHARD DOE; MUNICIPAL REVENUE COLLECTION CENTER ("CRIM"); PUERTO RICO TREASURY DEPARTMENT; UNITED STATES OF AMERICA; MARY DOE (hereinafter "Defendants"), due to against IRMA CONCEPCION FLORES FERREIRO A/K/A IRMA C. FLORES FERREIRO A/K/A IRMA FLORES DE TALLADA A/K/A IRMA FLORES TALLADA A/K/A IRMA FLORES FERREIRO, non-compliance with the terms and conditions of the note and mortgage executed by her. See Docket #4.

2. On **September 9, 2015**, this Honorable Court issued summons for all Defendants. See Docket #5.
3. Defendants MUNICIPAL REVENUE COLLECTION CENTER ("CRIM") and PUERTO RICO TREASURY DEPARTMENT were served with summons of the Complaint on **July 9, 2015**, as established by the return of service filed before this Honorable Court. Pursuant to the Federal Rules of Civil Procedure 4(e)(1), said defendants were required to serve their answer, or otherwise plead to the Complaint on or before **July 30, 2015**, respectively. See Dockets #10 and #11.
4. Defendant UNITED STATES OF AMERICA were served with summons of the Complaint on **July 9, 2015**, as established by the return of service filed before this Honorable Court. Pursuant to the Federal Rules of Civil Procedure 4(e)(1), said defendant was required to serve its answer, or otherwise plead to the Complaint on or before **September 8, 2015**. See Docket #7.
5. Defendant MANUEL ANTONIO ARROYO FLORES was served with summons of the Complaint on **September 24, 2015**, as established by the return of service

filed before this Honorable Court. Pursuant to the Federal Rules of Civil Procedure 4(e)(1), said defendant was required to serve their answer, or otherwise plead to the Complaint on or before **October 15, 2015**. See Docket #9.

6. Defendants MARY DOE and RICHARD DOE do not exist.
7. The above named Defendants have not appeared before this Honorable Court in response to the filed and duly served complaint. Furthermore, no answer to the Complaint or other responsive allegation has been served upon Plaintiff or the undersigned attorney by Defendants, even after expiration of their respective applicable terms.
8. Given that the Defendants have failed to defend against Plaintiff's claims in the instant case, and have not served the undersigned counsel with any responsive allegation, Plaintiff respectfully requests the Clerk of this Honorable Court to enter the default against MUNICIPAL REVENUE COLLECTION CENTER ("CRIM"); PUERTO RICO TREASURY DEPARTMENT; UNITED STATES OF AMERICA and MANUEL ANTONIO ARROYO FLORES.

WHEREFORE, pursuant to Federal Rule of Civil Procedure 55(a), Plaintiff very respectfully requests that the Clerk of the Court enter default against MUNICIPAL REVENUE COLLECTION CENTER ("CRIM"); PUERTO RICO TREASURY DEPARTMENT; UNITED STATES OF AMERICA and MANUEL ANTONIO ARROYO FLORES.

I HEREBY CERTIFY that today we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which, on information and belief, will notify any appearing parties that are CM/ECF participants and also sent true copies of this document to Defendants as per the attached service list.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 30th day of November, 2015.

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SERVICE LIST
CASE NO. 3:15-CV-01224-SEC

UNITED STATES OF AMERICA
C/O US ATTORNEY OFFICE, DISTRICT OF PUERTO RICO
TORRE CHARDON SUITE 1201
350 CARLOS E. CHARDON
SAN JUAN, PR 00918

THE ESTATE OF IRMA CONCEPCION FLORES FERREIRO A/K/A IRMA C. FLORES
FERREIRO A/K/A IRMA FLORES DE TALLADA A/K/A IRMA FLORES TALLADA A/K/A
IRMA FLORES FERREIRO COMPOSED BY MANUEL ANTONIO ARROYO FLORES
AND EDDIE ARROYO FLORES; RICHARD DOE;
APT 405 BORINQUEN TOWERS I COND
SAN JUAN, PR 00920

MUNICIPAL REVENUE COLLECTION CENTER ("CRIM")
PO BOX 195387
SAN JUAN, PR 00926

PUERTO RICO TREASURY DEPARTMENT
PO BOX 9024140
SAN JUAN, PR 00901

MANUEL ANTONIO ARROYO FLORES
APARTMENT 4F
LINCOLN PARK CONDOMINIUM
GUAYNABO, PR 00969

EDDIE ARROYO FLORES
B19 CALLE ADAMS, PARKVILLE
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